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*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

Adv. Pro. No. 10-04510 (SMB)

THE MURRAY FAMILY TRUST,

MURRAY B. FELTON REVOCABLE TRUST,

ESTATE OF MURRAY B. FELTON,

HOWARD A. KALKA, individually, in his  
capacity as grantor of the Murray Family Trust, and

in his capacity as trustee of the Murray Family Trust,

MILES J. FELTON, individually, and in his capacity as grantor of the Murray Family Trust,

THE DORIS FELTON FAMILY TRUST,

WILLIAM D. FELTON, individually, in his capacity as trustee of the Doris Felton Family Trust, in his capacity as trustee of the Murray B. Felton Revocable Trust, and in his capacity as personal representative of the Estate of Murray B. Felton,

LESLIE ENGELSON, and

ALICIA P. FELTON,

Defendants.

**STIPULATION AND ORDER OF VOLUNTARY DISMISSAL WITH  
PREJUDICE  
OF ADVERSARY PROCEEDING**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, and defendants The Murray Family Trust, Murray B. Felton Revocable Trust, The Doris Felton Family Trust, the Estate of Murray B. Felton, Howard A. Kalka, individually, in his capacity as grantor of the Murray Family Trust, and in his capacity as trustee of the Murray Family Trust, Miles J. Felton, individually, and in his capacity as grantor of the Murray Family Trust, William D. Felton, individually, in his capacity as trustee of the Doris Felton Family Trust, in his capacity as trustee of the Murray B. Felton Revocable Trust, and in his capacity as personal representative of the Estate of Murray B. Felton, Leslie Engelson, and Alicia P. Felton (“Defendants”), by and through their counsel, Dentons US LLP (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On November 30, 2010, the Trustee filed and served the Complaint against Defendants.

2. On April 18, 2014, Defendants served an answer on the Trustee.

3. On May 10, 2016, the Parties entered into a settlement agreement pursuant to the Settlement Procedures Order, entered by this Court on November 12, 2010 [Dkt. No. 3181].

4. In accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(ii), and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to a dismissal with prejudice of the Trustee's claims against Defendants in the above-captioned adversary proceeding (the "Murray Family Action").

5. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.

6. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: New York, New York  
June 28, 2016

**BAKER & HOSTETLER LLP**

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Substantively Consolidated SIPA Liquidation of*

*Bernard L. Madoff Investment Securities LLC and  
the Estate of Bernard L. Madoff*

**DENTONS US LLP**

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*Attorneys for Defendants*

**SO ORDERED**

**Dated: June 28<sup>th</sup>, 2016  
New York, New York**

/s/ STUART M. BERNSTEIN  
**HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE**